

August 7, 2013

Mignon Clyburn,  
Chairwoman,  
Federal Communications Commission,  
445 Twelfth Street SW,  
Washington, DC 20554

Re: Globalstar, Inc. Petition for Rulemaking to Reform the Commission's Regulatory Framework for Terrestrial Use of the Big LEO MSS Band – RM-11685

Dear Chairwoman Clyburn,

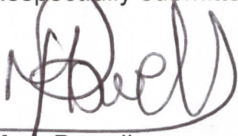
Globalstar in its letter to you dated August 2, 2013 makes a startling and incorrect conclusion of the statements in my prior letter to you dated August 1, 2013. Bluetooth SIG is NOT asking for exclusive use of the 2473-2483.5MHz portion of the ISM band, nor is Bluetooth SIG suggesting that the commission block new uses of this spectrum. Without cloaking or euphemism, Bluetooth SIG is simply pointing out that Globalstar's proposal WILL result in increased congestion in that portion of the frequency band and that as a result the users of over 2 Billion Bluetooth products WILL experience poorer quality service.

What is even more surprising is that Bluetooth SIG already addressed this incorrect conclusion by Globalstar in a recent conference call initiated by Bluetooth SIG in an attempt to establish open dialog regarding the lack of attention in Globalstar's proposal to the Bluetooth "Traffic Jam" issue. In that conference call, Globalstar incorrectly made the same assertion that Bluetooth SIG is asking for exclusive use of the 2473-2483.5MHz portion of the ISM band. During that same call Bluetooth SIG addressed and corrected this assertion. So it is both puzzling and disappointing that Globalstar seeks to waste your and the commission's valuable time making a false allegation and not dealing with the issue at hand, which is the impact that increased congestion will have on Bluetooth users.

Bluetooth SIG and its members are NOT convinced by Globalstar's technical arguments, and remain concerned that the kind of usage proposed by Globalstar will have a negative effect on Bluetooth users, including those in Schools, Libraries, Healthcare and Emergency response. We therefore urge the Commission NOT to move forward with a Notice of Proposed Rulemaking on Big LEO MSS Band until a full technical analysis of the impacts has been completed and the impact on the existing users of the ISM spectrum is understood.

As I mentioned in my previous letter Bluetooth SIG and its members are willing and ready to participate in technical studies should the commission decide that a Notice of Inquiry is the best next step.

Respectfully submitted,



Mark Powell

Executive Director

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